Staff guidelines for the use of generative Artificial Intelligence

Publish date: October 2026
Next review: six months

CONTENT	PAGE
Our Commitment	2
Background / context / purpose	2-3
Scope and definition	3-4
Meaningful documentation comes first	4
Our 6 principles for AI use	4-5
Applying the principles	5
Disclosure	6-7
Approved AI tools	8
What to consider and what to avoid	8-9
Data storage / roles and responsibilities	9-10
AI use checklist	10-11

Our commitment

Technology will never replace the relationships and professional knowledge that underpin high-quality early childhood education and care. Therefore, we will only use generative artificial intelligence (AI) when it **strengthens** these things - never when it substitutes for them.

We approach AI the same way we approach everything at Shine Bright - through the lens of our **values** - with integrity, curiosity, courage, clarity and respect.

We will adopt an approach of **cautious curiosity** when using AI which means we will understand our role in data governance, question where information goes, check AI outputs against pedagogical and other knowledge, maintain professional judgement rather than outsourcing decisions and remain open to genuine improvements and innovation.

> We are committed to keeping **meaningful documentation** - not speed or convenience - as our measure of success and these guidelines serve to preserve the integrity of this commitment.

Start small | go slow | be curious | use caution

Background and context

Artificial intelligence is already part of the tools our staff use - inside documentation platforms, in everyday software, and on the mobile devices staff use to do their work. While there is an Australian Framework for Generative AI in Schools there is no equivalent for the ECEC sector. The sector is somewhat at a crossroads, grappling with the potential benefits and challenges of integrating Generative Artificial Intelligence (Gen-AI, also referred simply as AI in this document) into our assessment practices and daily routines.

Supporters of Gen-AI argue for enhanced efficiency in the documentation of the early years planning cycle and in day-to-day administration and child observations, however, opponents worry that Gen-AI might over-interpret observational evidence, overstate child learning or make inaccurate assumptions, undermining professionalism of the sector. In a more general sense, there is emerging opposition and science, that cautions against AI owing to its impact on critical thinking, with suggestions that we are creating a generation of prompt managers rather than thinkers.

“Meaningful documentation” is a key enabler of The Shine Bright Way and given the impact that AI can have on written documentation, along with our values this is one of the key lenses through which the AI guidelines are refracted. Our educators pride themselves on the importance of authentic documentation that reflects genuine interactions and learning outcomes, a concept that has also been consistently emphasised by the Australian Children's Education and Care Quality Authority (ACECQA).

These guidelines help to fulfil our commitment in the Shine Bright Constitution to *"ensure that adequate policies exist as to the purpose, development and use of AI and must ensure that all actions and activities initiated or contributed to by AI are demonstrably for the benefit of the Company, its stakeholders and the local community it provides services to."*

Purpose

The Shine Bright AI guidelines establish principles for the ethical, responsible and effective use of generative AI tools and ensure alignment with our mission and values.

Specifically, these guidelines aim to:

- Retain the integrity of our Meaningful Documentation guidelines
- Support the use of generative AI to enhance service productivity and achieve our strategic objectives
- Ensure transparency in our AI practices so we can maintain confidence within our organisation and with families
- Provide a risk lens for identifying, assessing and managing the risks associated with AI tools
- Provide new opportunities to engage and empower our staff

It is recognised that these guidelines alone are not sufficient to give educators confidence in their use of generative AI tools and that AI literacy in teacher education programs and ongoing professional development needs consideration.

While these things are developed, the following videos provide a useful foundational overview of generative AI:

National AI Centre: AI explained (4 minutes)

Five things to know about AI: BBC (5 minutes)

Four Things to Know About AI: CSIRO (4 minutes)

Scope and definition

Definition: Artificial Intelligence (AI) means technology that enables computers and machines to simulate human learning, comprehension, problem solving, decision-making, creativity and autonomy.

These guidelines apply specifically to **generative AI**; which refers to artificial intelligence systems that can create statistically probable content, such as text, images and videos, in response to user prompts. The guidelines do not cover basic AI functions like spell-check or autocorrect, which involve no **generative** AI.

Scope: These guidelines apply to all educators, leaders and professional service staff at Shine Bright, and to any generative AI-enabled tool used in connection with our work - including documentation and learning-story platforms, planning and admin tools, translation tools, image-generation tools, and general-purpose AI assistants including generative AI tools like Chat GPT and Microsoft Co-Pilot.

Because the guidelines focus on supporting Meaningful Documentation, they are largely suited to educators, however, the adoption of the principles within these guidelines apply to all Shine Bright staff.

The guidelines apply whether the tool is provided by Shine Bright or introduced personally. If you are ever unsure whether a tool is covered by these guidelines, please seek guidance from your Early Years Advisor or the Chief of Strategy, Transformation and Communications.

These guidelines draw on emerging Australian and international research into generative AI in early childhood education and care, and on what other sectors are already learning about AI in the workplace.

This document works alongside — and never overrides — our existing policies on privacy, child safety, professional conduct and information technology. (Links to these policies below). All staff are expected to use generative AI in accordance with these guidelines and should seek guidance if any part of the guidelines is unclear.

Meaningful Documentation comes first

Meaningful Documentation is a key enabler of the Shine Bright Way, and it is the lens through which our guidelines are framed. Documentation exists to share children's learning with them and their families - it is not a record of tasks completed.

Meaningful documentation centres around educators writing less and conveying more.

AI text-generation tools by design, produce a lot of confident-sounding text quickly. That is precisely why they need the most care in a documentation context: fluent language is not the same as meaningful learning, and a tool cannot know a child the way their educator does.

Before using any AI tool anywhere near documentation, educators should ask:

- Does this help me capture what the child is learning, not just what they did?
- Does it protect and amplify the child's voice, rather than speak over it?
- Would I still be excited to read this back to the family?

If the answer to any of those is **no**, the tool is not being used in a way that fits our approach, regardless of how much time it saves.

Our 6 principles for AI use

AI systems and tools must align with our values, respect human dignity and empower human judgment for ultimate decision making. All uses of AI systems must reflect Australia's AI Ethics Principles and our values and contribute positively to our mission. AI must not be used to deceive or manipulate the recipients of the information being generated.

1 Reliability and Quality

AI-generated text can sound confident and be wrong. Every AI suggestion - a drafted observation, a translated note, a planning idea - is a first draft, never a final word. The educator who knows the child checks information before it is published or acted on.

2 Data security and privacy

We only use approved AI tools and never enter identifiable child, family or staff information into unapproved platforms. Staff must understand where information goes, who can access it, and must not use AI in ways that compromise privacy, child safety or professional judgement.

AI tools do not change these responsibilities - they add to them.

3 Sustainability

We choose AI tools thoughtfully rather than adopting every new feature. A tool earns a place in approved list because it serves children, families and educators over time - not because it is new.

4 Transparency

Families have a right to know when AI has been used to help prepare something about their child, and educators have a right to know which tools are approved and why. We are open about both. Disclosure guidance is below.

5 Fairness and inclusion

AI tools are trained on data that carries the biases of the internet. We watch for outputs that stereotype a child, a family, a culture or a way of speaking, and we correct them - we do not let a tool's wording stand in for our own professional judgement.

6 Accountability and human oversight

Our people remain responsible for every AI-supported decision, document or action. AI can assist, but it must not make or automate decisions about child safety, wellbeing, inclusion or behaviour support, and all outputs must be checked by the author of the content. AI never carries responsibility - people do.

Applying the principles

Following the format of our Meaningful Documentation guide, following is what responsible AI use looks like in our services, side by side with what it doesn't.

This practice looks like	This practice does NOT look like
Documenting what the child is learning, not what they are doing.	
Using AI to draft a starting point for a learning story, then rewriting it in your own voice so the child's words, gestures and "a-ha" moment are what the family reads.	Copying an AI draft straight into a child's portfolio without reading it, checking it, or adding what only you observed.
Documentation provides evidence of working towards goals and learning outcomes	
Asking an approved tool for ideas to extend an interest you've already noticed in a child, then testing those ideas against what you know of that child.	Asking AI what a child "should" be learning next without first referencing the Kindergarten Learning Progressions and combining this with your own observation and relationship with the child.
Children contributing to documenting their own learning in ways that are accessible and meaningful to them.	
AI would not support quality improvement in this instance and would likely distort the child's words or intentions.	Taking information from a child and altering it with the use of AI, including images created by children.
Educators set up realistic expectations at the start of the year and during orientation processes with families for the documentation they provide.	

This practice looks like	This practice does NOT look like
Telling families plainly, if they ask, that a tool helped structure a document - and always naming yourself as the educator who observed and wrote it.	Letting families believe every word was written by the educator who knows their child, when a tool did the drafting unchecked.
Using a language translation tool to help a family read a routine notice and following up in person for anything sensitive or complex.	Relying on a language translation tool alone for a sensitive conversation about a child's wellbeing or a family's circumstances.
We document our learning and act on the documentation provided to us from other professionals to capture best practice, to enable quality improvement.	
Raising a concern, a great result, or a tricky moment with an AI tool with your educational leader so the whole team learns from it.	Using an AI tool quietly, without telling anyone, because you're not sure it's allowed ("shadow use").
Treating AI intentionally and in line with Shine Bright's AI Guidelines - as a tool that must earn its place by supporting quality, never a shortcut that replaces thinking.	Choosing a tool because it is fast, without asking whether it is helping children's learning become more visible or less visible.
All educators are confident to and trusted to contribute to the documentation of children's learning. Teachers and leaders support their staff to do this, help build the educator's capacity and knowledge, and discuss what meaningful documentation is.	
For educators who lack confidence in documentation, AI tools chosen with intention can provide much-needed support if used according to these guidelines. Assistance with grammar, structure, and refining learning outcomes is appropriate.	Choosing a tool to compensate for confidence in documentation, rather than first seeking support from a colleague or manager and using the tool as a supplementary support.

Disclosing AI use in everyday practice

Our Transparency principle says families have a right to know when AI has substantially helped prepare something about their child. Below is guidance on when disclosure needs to happen in day-to-day work, and what it should actually look like.

When to disclose

Not every use of AI needs a visible label. Whether something needs disclosing depends on two things:

1) how much it could affect a child, family or colleague if it turned out to be wrong or misleading, and
2) how much of the finished piece AI actually produced, rather than merely tidied.

- **Low impact, light-touch use:** Grammar and spelling checks, a photo brightness fix, a scheduling suggestion — no disclosure needed.
- **AI helped shape the content, but you've made it your own:** a drafted learning-story starting point, a suggested activity idea - you've reviewed, rewritten and taken ownership of it, so a simple, honest answer, if asked, is enough.
- **AI's output reaches families directly with limited rewriting:** a newsletter paragraph, a translated notice, a program plan shared largely as generated - a simple, honest answer if asked is enough.

- **Anything related to a child's wellbeing or an important decision about them:** an incident report, a behaviour-support note, an individual learning plan - always disclose, and always confirm a named person, not a tool, is accountable for its accuracy. Only use to achieve clarity and grammatical accuracy.

How to disclose

Keep it simple and honest. A short, plain-language line is enough for our context.

- **Say what happened, not how the tool works: e.g.** 'This activity idea was suggested by an AI tool and adapted by [educator name]'
- **Put the disclosure where the person will actually see it:** in the document itself, in the newsletter, or spoken plainly if a family asks.
- **Match the language to the audience:** the same accessibility care we bring to any family communication applies here too.
- **Never let a disclosure substitute for a check:** disclosing that AI was involved doesn't replace the author confirming the content is accurate - our Reliability and Transparency principles work together, not instead of each other.
- **When you're not sure whether something needs a label, treat it as if it does:** a family would rather be told AI helped than assume it wasn't involved.

General disclosure statement

The following may be used as a general disclosure statement:

> *AI has assisted with this work. All content has been checked and approved by the author.*

Some examples of how disclosure might apply:

Everyday example	Disclose?	How
A learning story drafted with AI help, then rewritten in the educator's voice before it reaches families.	Only if it stayed substantially AI-drafted	Name the educator who observed and wrote it; mention AI's role if a family asks.
A newsletter paragraph or routine notice generated by AI and only lightly edited.	Only if it stayed substantially AI-drafted	A short line such as 'prepared with AI assistance', placed where families will see it, if necessary.
Program or curriculum planning notes used only within the team.	Not usually needed	Mention it in team discussion if it shaped a decision worth others knowing about.
Any incident report, behaviour-support note or individual learning plan – for polishing, not producing.	Always	Verbal and written disclosure, with a named educator taking responsibility for accuracy.
A poster, icon or design element generated by AI for the service, with no real child in it.	Not usually needed	Mention it in team discussion if it shaped a decision worth others knowing about.
A routine notice translated for a family using a translation tool.	Only if asked	Mention it if a family asks how the translation was done; follow up in person for anything sensitive.

Approved AI tools for use at Shine Bright

New AI tools and features appear constantly, and the approved tools below will be updated as new platforms are reviewed. Only the below AI tool/s may be used at Shine Bright.

Microsoft Copilot within the Shine Bright MS 365 licence tenancy:

First choice and only choice with cautious curiosity

Use the enterprise version. This is the Co-Pilot that appears on your device when logged in with your Shine Bright credentials, not the consumer version that you can access on the internet.

Data stays within our Microsoft 365 compliance/tenant boundary, in whichever region the tenancy is provisioned. Australian tenants generally sit in Australian regions. Through its licencing arrangements, Shine Bright has essentially told Microsoft "don't use anything my staff type to train your models."

The safest habit is still to assume anything you type could, in principle, be seen or stored by someone else - and to never input something you wouldn't be comfortable with a stranger reading, and never put a child's name, photo, or personal details into Copilot.

Rationale for this choice

Copilot within our tenancy agreement is the most data-secure AI platform available to us and a tool that is high-performing for a variety of tasks.

The simplicity of offering just one AI platform to staff means there is no confusion over which AI platform to use when. This is expected to make users feel more confident in their use of AI and help to achieve higher AI guideline compliance.

Platforms: what to consider, and what to avoid

Category	Consider (once approved)	Avoid / not permitted
Documentation & learning-story platforms	StoryPark (including its StoryPark Assist feature, used as a coach for phrasing and reflection prompts, never as the author), and any AI features inside Xplor (HUB) - only once reviewed and switched on by Shine Bright EYM.	Turning on an AI feature in any documentation platform yourself, without it having gone through our review process — even if it's already sitting in the app. NOT CURRENTLY USING
General-purpose AI assistants permitted: **Microsoft Copilot**	Co-Pilot is the only current option because there are existing security controls in place to help ensure data remains protected. Generic, non-identifiable uses: brainstorming activity ideas, drafting a newsletter template, summarising a professional article, wording a generic policy paragraph.	Typing in any child's name, photo, diagnosis, behaviour incident, family situation or anything that could identify a specific child or family — these are consumer tools and we do not have an approved data agreement for identifiable information with them.

Category	Consider (once approved)	Avoid / not permitted
AI companions, chatbots and conversational AI toys (e.g. Character.AI, Replika, AI-enabled talking teddy bears or smart toys)	Not applicable — these are not used in our services.	Any use with children, in any room, for any reason. These tools are designed to sound like a human, agree with the user and keep the interaction going, which should occur only in person.
Translation tools (e.g. Google Translate, DeepL)	Translating routine, non-sensitive written communication to families, with a follow-up conversation available if needed, with a preference for plain English.	Relying on translation alone for anything sensitive — a wellbeing concern, an incident, a complex family conversation. Arrange an interpreter or bilingual staff member instead. The Department of Education have a free translation service. Click the link to make a booking. All Graduates Interpreting and Translating
Image and design tools (e.g. Canva AI, Adobe Firefly, photoshop)	Generating generic images, icons or design elements for posters, newsletters and resources.	Generating or editing any image that includes, resembles, or is based on a real, identifiable child. Contact Communications & Brand Co-ordinator for correct use of Shine Bright logos.
Tools that capture meeting transcripts (e.g. MS Teams)	If a meeting is recorded and transcription is enabled, AI creates the transcript from the meeting audio. AI can generate meeting summaries; action items; decisions made; unanswered questions, etc. This is permitted.	Take names out of the transcript if being circulated beyond the circle of attendees at the meeting, unless express permission is given by participants.
AI features inside everyday software (e.g. spelling/grammar suggestions, calendar scheduling, meeting note-takers)	Everyday writing and admin support that does not touch identifiable child or family information are permitted and are generally not generative AI.	Meeting note-takers or transcription tools recording conversations that include identifiable information about children or families, unless specifically approved.

> *A note on documentation-platform AI features: several platforms our sector already uses — including Storypark and Xplor — are adding AI features on a rolling basis, sometimes without a service switching anything on. Do not assume a feature is approved just because it has appeared in an app you already use. If you notice a new AI feature has appeared, tell your Educational Leader and Nominated Supervisor so it can be reviewed.*

Data storage locations

Most AI tools have a "free/consumer" version and an "organisational/enterprise" version they are different products with different data-handling rules, even though they often look identical on screen. An educator using ChatGPT signed into a personal free account is a different privacy situation than the same educator using an organisationally licensed, tenant-bound version, even though the interface looks the same.

At Shine Bright our Microsoft 365 licence comes with the Co-Pilot AI capability with users able to enable Claude and ChatGPT functionality. (Pending paid upgrade). This is the only AI tool bound by our tenancy agreement and offers the most secure AI use, thus being the preferred AI tool.

Roles and responsibilities

Role	What they own	What this means day to day
AI Policy Owner	Chief of Strategy, Transformation and Communications	Approves new tools, keeps this document current, makes the final call on anything unclear.
Nominated Supervisors / Educational Leader	The person responsible for AI use in their service, day to day.	Supports educators, checks new features before switching them on, is the first point of contact for questions or concerns.
Educators and staff	Everyone who uses any tool covered by these guidelines.	Uses only approved tools, checks every AI output before relying on it, never enters identifiable information into an unapproved tool, and speaks up if something feels wrong.

Before you use a new AI tool: a quick checklist

- ❑ Is this tool on our approved list, or has it been reviewed and switched on by my educational leader?
- ❑ Am I about to enter a child's name, photo, diagnosis, incident or any identifying family detail? If yes — stop, unless this specific tool is approved for that purpose. This is ONLY Microsoft Co-Pilot enterprise version and information should be de-identified.
- ❑ Could I explain, in plain language, what this tool does with the information I give it?
- ❑ Have I checked the output against what I actually observed, before I publish or act on it?
- ❑ If a family asked me whether AI was involved, could I answer honestly and clearly?
- ❑ If I'm not sure about any of the above — ask your educational leader before you use the tool, not after.

Data and privacy: our non-negotiables

- Never enter a child's name, image, diagnosis, behaviour incident or family circumstances into a tool that has not been specifically approved for that purpose, for example, Storypark or EnrolNow. De-identified information can be put into our enterprise version of Co-Pilot.
- Know, for every tool you use, roughly where the information goes and who can see it. If you can't answer that, ask before you use it. (Refer Approved AI Tools For Use at Shine Bright within these guidelines).
- Never assume an AI tool is confidential just because it "feels" private — free and consumer AI tools may use what you type to improve their own systems.
- Be ready to tell a family, honestly and simply, when and how AI was used in something about their child.

Keeping this document alive

These guidelines will be reviewed at least six-monthly and sooner if there is a significant incident, a major new tool becomes available, or relevant laws or sector guidance change. Review is led by the Chief of Strategy, Transformation and Communications in consultation with educational leaders and Central Office teams — because the people using these tools every day are best placed to say what's working.

Related Shine Bright policies

Confidentiality and Privacy Policy

Child Safe Environment and Wellbeing Policy

Safe Use of Digital Technologies and Online Environments (Attachment 7)

AI Disclosure for these guidelines

The authors acknowledge the deliberate use of Microsoft Co-Pilot and Claude.au in writing these guidelines. These tools were used predominantly to summarise articles and research papers about AI (source articles are below); to identify any existing legislation or policy on AI in Australia and to surface AI policy templates from Australian authorities. Information was verified by Bendigo Telco and key Central Office staff.

Useful sources:

- Minderoo Foundation roundtable leadership group: Safe AI report. https://www.safeai.org.au/
- Gradient Institute Guide to Using AI https://www.gradientinstitute.org/guides/using-ai-safely
- The Australian Government's National AI Centre/ Responsible AI Network (RAIN): https://www.ai.gov.au/
- Australian Research Council report: AI in Children's Lives: https://issuu.com/digitalchild/docs/_generative_ai_in_children_s_lives_issues_in_the_
- Australian Information Industry Association (AIIA): https://aiia.com.au/
- CSIRO Data61:

  https://www.csiro.au/en/about/challenges-missions
- KPMG AI framework: https://kpmg.com/xx/en/what-we-do/services/ai/trusted-ai-framework.html
- Artificial Intelligence and the Future of Teaching and Learning (U.S. Department of Education) https://www.ed.gov/sites/ed/files/documents/ai-report/ai-report.pdf

Reference articles:

- AI in early learning: from experimentation to responsible integration
- AI and ECEC: What conversations do providers need to consider?
- GenAI is now in our childcare centres. But there isn't any guidance

- Generative AI-supported reflective practice in early childhood education and care: A critical review of ethical, policy, and professional implications
- Applications of generative AI in early childhood education: A systematic review
- The Interaction of AI and Early Childhood Education: A State-of-the-art Review (2020–2024)
- The Key Artificial Intelligence Technologies in Early Childhood Education: A Review
- Artificial intelligence to be managed through existing laws under National AI Plan. ABC News: https://www.abc.net.au/news/2025-12-02/national-artificial-intelligence-plan-growth-existing-laws/106086474
- Approach that aligns with ECEC: https://blog.storypark.com/2026/01/the-power-of-cautious-curiosity-an-approach-to-ai-that-aligns-with-ecec/
- UNESCO's Recommendation on the Ethics of Artificial Intelligence: key facts: https://unesdoc.unesco.org/ark:/48223/pf0000385082.page=12
- Regulating AI in the workplace: A critique of the EU AI act and the platform: work directive through a worker-centred lens: https://doi.org/10.1177/29768624251396248
- Squiz Series: AI agents and the law (based on Minderoo commissioned research): https://podcasts.apple.com/au/podcast/squiz-series-ai-agents-and-the-law
- The Business of AI: University of NSW: https://www.unsw.edu.au/business/our-schools/agsm/about-us/the-business-of-podcast/the-business-of-AI
- Trust in AI report by KPMG showing low levels of trust in Australia compared to other countries: https://kpmg.com/au/en/insights/artificial-intelligence-ai/trust-in-ai-global-insights-2025.html